

## EXHIBIT A

WR Grace:

Plan Proponents' Trial Exhibit List (Description Order)  
Documents Other Than Pleadings and Plan Documents

<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		00/00/1988	1988 Manville Trust Claims Resolution Procedures	
		00/00/1995	1995 Manville TDP	
		00/00/1998	1998 Tax Sharing Agreement	
		00/00/2002	2002 Manville TDP	
Frank 012; Molgaard 019; Welch 005; Whitehouse 005 (06/16/2009)		00/00/2004	2004 ATS (American Thoracic Society) Statement, Diagnosis and Initial Management of Nonmalignant Diseases Related to Asbestos	
Whitehouse 010 (06/16/2009)		08/14/1997	Agreement and Plan of Merger dated as of August 14, 1997, by and among W.R. Grace & Co., Packo Acquisition Corp., and Sealed Air Corporation	
		00/00/0000	AMA's Guides to the Evaluation of Permanent Impairment (5th ed.)	
		00/00/2004	Ameille J, Matrat M, Paris C, Joly N, Raffaelli C, Brochard P et al. Asbestos-related pleural diseases: dimensional criteria are not appropriate to differentiate diffuse pleural thickening from pleural plaques. Am J Ind Med 2004; 45(3):289-296	
		04/11/2001	Amended Complaint Adding New Party Defendants Devco Corporation Sealed Air Corporation, Hopkins, et al. v. A-Best Products Co., et al., Case Nos. 375292, et al. (Court of Common Pleas, Cuyahoga County, Ohio)	
Whitehouse 012 (06/16/2009)		00/00/1991	ATS (American Thoracic Society), Lung Function Testing: Selection of Reference Values and Interpretive Strategies	

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	Frank 010	10/00/2008	ATSDR Summary Report: Exposure to Asbestos-Containing Vermiculite from Libby, Montana, at 28 Processing Sites in the United States	
		00/00/2002	Babcock & Wilcox TDP	
		00/00/1988	Bourbeau J, Ernst P. Between and Within Reader Variability in the Assessment of Asbestos - Related Pleural Disease Using the ILO 1980 International Classification of Pneumoconiosis. Am J Ind Med 1988; 142: 837 - 842	
	Whitehouse 015 (06/16/2009)	05/04/2009	CARD Mortality Study, 76 Non-Malignant Deaths, CHX Readings by Dr. Whitehouse	
	Whitehouse 004 (06/16/2009)	05/29/2009	CARD Website Materials: (1) Libby Asbestos FAQs; (2) Exposure in Libby Montana and (3) Exposure Across the Nation	
	Hughes 144	00/00/2002	Chart entitled "Asbestos Bodily Injury Cases with a Judgment Settlement"	
	Molgaard 014	12/16/2008	Chart entitled "Mesothelioma Cases with Exposure to Libby Asbestos as a Significant Factor (Alpha Order)"	
		00/00/0000	Chart of Non-Libby Claimants Resolved Claims with Respect to Non-Products/Premises Claims	
		05/15/2009	Charts attached to the Expert Report of Pamela Zilly in Rebuttal to the Expert Report of H. Sean Mathis	
		05/08/2000	Class Action Complaint and Demand For Jury Trial, Goldstein et al., v. W.R. Grace et al., Case No. 00-10873 (PBS) (D. Mass.)	

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		05/12/2000	Class Action Complaint and Jury Demand, Chakarian et al., v. W.R. Grace & Co. et al., Case No. 00cv10934 (PBS) (D. Mass.)	
		04/02/2001	Class Action Complaint for Injunctive Relief and Damages, Woodward v. Sealed Air et al., Case No. 01-10547 (D. Mass.)	
		00/00/2000	Complaint for Declaratory Relief in Continental Casualty Company v. W.R. Grace & Co. and W.R. Grace & Co.-Conn	
		00/00/2001	Complaint, Abner v. W.R. Grace & Co., Case No. 01-3070 (TC) (N.D. Cal.)	
		00/00/2009	Curriculum Vitae for Daniel A. Henry	
		00/00/2009	Curriculum Vitae for Howard Ory	
		00/00/2009	Curriculum Vitae for John Parker	
		00/00/2009	Curriculum Vitae for Pamela Zilly	
		00/00/0000	Curriculum Vitae for Suresh H. Moolgavkar	
		00/00/2009	Curriculum Vitae for Thomas Florence	
Frank 008		06/00/2009	Curriculum Vitae of Arthur L. Frank	
		00/00/2009	Curriculum Vitae of David Weill, M.D.	
		00/00/2009	Curriculum Vitae of Laura S. Welch	
		00/00/2009	Curriculum Vitae of William E. Longo	
		00/00/1989	David A. Lynch, Gordon Gamsu, M.D. Denise R. Aberle, Conventional & HRCT in the diagnosis of asbestos related diseases 9 RadioGraphics 523 (1989)	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		00/00/1993	David A. Schwartz, Jeffrey R. Galvin, Steven J. Yagla, Stephen B. Speakman, James A. Merchant, and Gary W. Hunninghake, Restrictive Lung Function and Asbestos-induced Pleural Fibrosis 91 J. Clinical Investigation 2685 (1993)	
		00/00/2009	Demonstrative Exhibits and Summaries To be Used During Dr. Peterson's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Daniel Henry's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During David Weill's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Denise Martin's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Dr. Welch's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Howard Ory's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During John Parker's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Longo's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Pamela Zilly's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Suresh Moolgavkar's Testimony	
		00/00/2009	Demonstrative Exhibits to be Used During Thomas Florence's Testimony	
		00/00/0000	Demonstrative Timelines and Other Historical Information Regarding Case History	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		00/00/2000	Deposition Transcript (Vol. 1 of 2) of Dr. Dayton Prouty in Jerry Dell Davis, et al., v. Able Supply Company , et al.	
		00/00/2000	Deposition Transcript (Vol. 2 of 2) of Dr. Dayton Prouty in Jerry Dell Davis, et al., v. Able Supply Company , et al.	
		03/30/1998	Distribution Agreement dated as of March 30, 1998, by and among W.R. Grace & Co., W.R. Grace & Co.-Conn. and Grace Specialty Chemicals, Inc. (to be renamed W.R. Grace & Co.)	
Peterson 004		06/07/2009	Email from N. Finch to D. Cohn re Grace/Peterson Deposition	
		00/00/2009	Email from S. Hammar to B. Bailor enclosing Libby, Montana Expert Report	
Hammar 015		06/00/1986	EPA Airborne Asbestos Health Assessment Update	
		00/00/0000	Exemplar Asbestos Personal Injury Complaints Naming Sealed Air and/or Fresenius as a Defendant	
		00/00/0000	Exemplar Demands for Indemnification Made by Sealed Air Against Grace	
		07/24/2009	Exhibits to the Expert Report of Pamela Zilly (to be filed 07/24/2009)	
Welch 001		03/00/2009	Expert Rebuttal Report of Laura S. Welch	
Molgaard 017		11/03/2003	Expert Report of Craig A. Molgaard, Ph.D., M.P.H. in Sapp v. Natural Balance	
		03/16/2009	Expert Report of Denise Neumann Martin	
		03/16/2009	Expert Report of Denise Neumann Martin Ex. 1 - Curriculum Vitae	

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		03/16/2009	Expert Report of Denise Neumann Martin Ex. 2 - Counts of Class 7B Property Damage Claims Filed During the Bankruptcy By Submitting Law Firm	
		03/16/2009	Expert Report of Denise Neumann Martin Ex. 3 - Counts of Class 7B Damage Claims Filed During the Bankruptcy By Building State	
		03/16/2009	Expert Report of Denise Neumann Martin Ex. 4 - Counts of Class 7A Property Damage Claims Filed During the Bankruptcy By Law Firm and Counsel State	
		03/16/2009	Expert Report of Denise Neumann Martin Ex. 5 - Counts of Class 7A Property Damage Claims Filed During the Bankruptcy By Location of Property	
		03/16/2009	Expert Report of Denise Neumann Martin Ex. 6 - Summary of SEC 10K Disclosures of Asbestos-Related Property Damage Liability	
Frank 001		12/23/2008	Expert Report of Dr. Arthur Frank	
		12/29/2008	Expert Report of Dr. Terry Spear	
Welch 002		12/00/2008	Expert Report of Laura S. Welch	
		03/16/2009	Expert Report of Mark A. Peterson	
		07/24/2009	Expert Report of Pamela Zilly (to be filed 07/24/2009)	
		05/15/2009	Expert Report of Pamela Zilly in Rebuttal to the Expert Report of H. Sean Mathis	
		12/29/2008	Expert Report of William E. Longo entitled "W.R. Grace Asbestos-Containing Construction Products: A Review of Asbestos Types, Source and Libby Vermiculite"	

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		00/00/2009	Feasibility Exhibits to be Identified at Close of Feasibility Discovery	
Whitehouse 003 (06/16/2009)		06/16/2009	Final Key Libby Patients	
		11/22/2000	First Amended Class Action Complaint, Abner et al., v. WR Grace et al., Case No. 315465 (Cal. Sup. Ct.)	
Molgaard 009		00/00/2009	Flow Chart entitled "Steps in the Scientific Method"	
Molgaard 010		00/00/2009	Flow Chart entitled "Steps in the Scientific Method" (with handwritten notations)	
		09/27/1996	Formation of Fresenius Medical Care Deal Book	
		06/05/2009	Frank Deposition Transcript	
		00/00/1999	Fraser R, Miller N, Colman N, Pare P. Fraser and Park's Diagnosis of Diseases of the Chest. 4th Ed. WB Saunders, Philadelphia, 1999; Vol IV: 2430-2437	
		00/00/0000	Group Exhibit: Various Communications Between WR Grace and Mendes Mount re Various Asbestos Litigation	
		00/00/0000	Group Exhibit: Various communications between WR Grace and AIG enclosing billing with respect to asbestos liabilities	
		00/00/2000	Guidelines for the Use of the ILO International Classification of Radiographs of Pneumoconioses	
Molgaard 013		00/00/2009	Handwritten Chart re Comparison of CARD Mortality to Markowitz	

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		00/00/1990	Hillerdal G, Malmberg P, Hemmingson A. Asbestos-related lesions of the pleura: parietal plaques compared to diffuse thickening studied with chest roentgenography, computed tomography, lung function, and gas exchange. Am J Ind Med 1990; 18(6):627-639	
		00/00/2009	Inselbuch Resume	
		00/00/0000	Insurance Policies that may be implicated by Scotts' allegations regarding Vendor Endorsements	
		03/31/1998	Insurance Procedures Agreement dated March 31, 1998, by and among W.R. Grace & Co., Grace Specialty Chemicals, Inc., and Sealed Air Corporation	
		00/00/1980	International Labour Office Geneva. Guidelines for the use of ILO International Classification of Radiographs of Pneumoconioses Rev. Ed. 1980	
		00/00/2002	International Labour Office; Guidelines for the Use of the ILO International Classification of Radiographs of Pneumoconioses, Revised Edition 2000. Geneva: International Labour Office, 2002	
		09/00/1996	Kee ST, Gamsu G, Blanc P., Causes of pulmonary impairment in asbestos-exposed individuals with diffuse pleural thickening. Am J Respir Crit Care Med. 1996 Sep; 154(3 Pt 1):789-93	
Whitehouse 008 (06/16/2009)		00/00/1983	Knudson et al., Changes in the Normal Maximal Expiratory Flow-Volume Curve with Growth and Aging	
		00/00/0000	Last, A Dictionary of Epidemiology, 4th Edition	

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	Whitehouse 009 (06/16/2009)	00/00/2003	Lee et al., Radiographic (ILO) Readings Predict Arterial Oxygen Desaturation During Exercise in Subjects With Asbestosis	
		03/31/1998	Letter Agreement Re: Grace Packaging - Sealed Air Transaction Agreement for the Allocation and Securing of Certain Liabilities dated March 31, 1998, among W.R. Grace & Co., Cryovac, Inc., Grace Specialty Chemicals, Inc., Sealed Air Corporation, and Continental Casualty Company and its affiliates and subsidiaries including Transportation Insurance Company and Transcontinental Technical Services, Inc.	
Frank 009		11/14/2008	Letter from A. Kane to Administrator Johnson re SAB Consultation on EPA's Proposed Approach for Estimation of Bin-Specific Cancer Potency Factors for Inhalation Exposure to Asbestos	
		00/00/1988	Letter from D. Curreri to W. Longo re air sample for analysis by TEM	
		01/08/2002	Letter from David Bernick to Hon. Alfred Wolin detailing case history	
		00/00/1978	Letter from H.A. Eschenbach to S.V. Chamberlain re asbestosiform tremolite in warning placards on rail cars	
Hughes 110		02/02/1999	Letter from Hughes to McCabe re: Mississippi settlements	BOCAS000727 - BOCAS000728
Hughes 124		11/18/1997	Letter from Hughes to McCabe Re: settlement	BOCAS000384 - BOCAS000385
Hughes 121		06/09/1997	Letter from Hughes to Quinn re: settlement	BOCAS000331 - BOCAS000332
		03/28/2000	Letter from J. Heberling to Congressman Hill re H.R. 1283	

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	Peterson 005	06/07/2006	Letter from J. Heberling to M. Peterson enclosing "Settlements Data" sheet	
		00/00/1988	Letter from J. Henningson to W. Longo re air samples for analysis by TEM	
	Hughes 108	12/02/1997	Letter from J. Hughes to E. McCabe re Baron & Budd cases settling for \$50 million	BOCAS0000375 - BOCAS0000376
	Hughes 116A	05/23/2000	Letter from J. Hughes to E. McCabe re settlement of all asbestos personal injury claims involving Reaud, Morgan & Quinn clients for \$80 million	109-1615 - 109-1616
		00/00/1996	Letter from J. Restivo to S. Krouskos re examination of Company's financial statements as of 12/31/95	
		00/00/1977	Letter from J.W. Wolter to H.C. Duecker re Rock vs. Tremolite Correlation	
		07/08/2009	Letter from M. Brown (OneBeacon) to D. Rosenbloom re In re W.R. Grace & Co., et al., U.S. Bankruptcy Court for the District of Delaware, Bankr. Case No. 01-1139, and The Scotts Company v. American Employers Ins. Co., et al., Adv. No. 04-55083	
		07/08/2009	Letter from M. Brown (Seaton) to D. Rosenbloom re In re W.R. Grace & Co., et al., U.S. Bankruptcy Court for the District of Delaware, Bankr. Case No. 01-1139, The Scotts Company v. American Employers Ins. Co., et al., Adv. No. 04-55083, and anticipated coverage litigation to be brought by Kaneb Pipe Line Operating Partners L.P. and Support Terminal Services, Inc.	
		07/08/2009	Letter from M. Brown to G. St. Clair and D. Turetsky re: In re W.R. Grace & Co., et al., U.S. Bankruptcy Court for the District of Delaware, Bankr. Case No. 01-01139, and anticipated	

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			coverage litigation to be brought by Kaneb Pipe Line Operating Partners L.P. and Support Terminal Services, Inc., and exhibits thereto	
		04/06/2001	Letter from S. Martin to WR Grace re Notice of Third Party Claim/Intention to Seek Indemnification and Defense	
		12/19/2000	Letter from WR Grace to S. Martin et al. re Indemnification and Defense in Richard Mesquita et al., v. W.R. Grace & Company, et al., Civ. Case No. 315465	
		00/00/1991	Lilis et al., Pulmonary function and pleural fibrosis, 20 Am. J. Indus. Med. 145 (1991)	
Frank 015		00/00/1991	Lilis et al., Pulmonary Function of Pleural Fibrosis: Quantitative Relationships With an Integrative Index of Pleural Abnormalities	
Whitehouse 014 (06/16/2009)		00/00/0000	Lilis et al., The Effect of Asbestos-Induced Pleural Fibrosis on Pulmonary Function: Quantitative Evaluation	
		07/00/1988	Lilis R, Lerman Y, Selikoff IJ. Symptomatic benign pleural effusions among asbestos insulation workers: residual radiographic abnormalities. Br J Ind Med. 1988 Jul;45(7):443-9	
		00/00/1992	Lilis R, Miller A, Godbold J, Benkert S, Wu V, and Selikoff IJ. Comparative Quantitative Evaluation of Pleural Fibrosis and its Effect on Pulmonary Function in Two Large Asbestos - Exposed Occupational Groups - Insulators and Sheet Metal Workers , Environ Res 59; 49 - 66 (1992)	
		00/00/2008	Lockey et al., Low-Level Fiber-induced Radiographic Changes Caused by Libby Vermiculite	

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		00/00/1984	Lockey et al., Pulmonary Changes after Exposure to Vermiculite Contaminated with Fibrous Tremolite	
Molgaard 011		00/00/1997	Markowitz, et al., Clinical Predictors of Mortality from Asbestosis in the North American Insulator Cohort, 1981 to 1991	
		08/00/1984	McGavin CR, Sheers G., Diffuse pleural thickening in asbestos workers: disability and lung function abnormalities. Thorax. 1984 Aug;39(8):604-7	
		00/00/1985	McLoud T, et al. Diffuse pleural thickening in an asbestos- exposed population: prevalence and causes. Am Journal Roentgenology 1985; 144:9-18	
		00/00/1977	Memorandum from H.A. Eschenbach to E.S. Wood re Enoree Fiber Counts, 1970 to Present	
		00/00/1994	Memorandum from J. Hughes to R.H. Beber re Possible Class Action Settlement for Future Asbestos Bodily Injury Claims	
Whitehouse 007 (06/16/2009)		05/13/2009	Memorandum from J. Penton to A. Frank, F. Whitehouse re Counting Sheet	
		04/00/2001	Memorandum from J.V. Port to R. H. Beber et al., re Monthly Asbestos Litigation Summary - March	
		00/00/1983	Memorandum from W.R. Wright to Expanding Plant Managers re Fiber Control and Communications	
Whitehouse 011 (06/16/2009)		09/08/2008	Miles et al., Clinical Consequences of Asbestos-Related Diffuse Pleural Thickening: A Review, (J. Occup. Med. Toxicol., 3:20, 09/08/2008)	

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		02/00/1992	Miller A, Lilis R, Godbold J, Chan E, Selikoff IJ., Relationship of pulmonary function to radiographic interstitial fibrosis in 2,611 long-term asbestos insulators. An assessment of the International Labour Office profusion score. Am Rev Respir Dis. 1992 Feb;145(2 Pt 1):263-70	
		01/00/1994	Miller A, Lilis R, Godbold J, Chan E, Wu X, Selikoff IJ., Spirometric impairments in long-term insulators. Relationships to duration of exposure, smoking, and radiographic abnormalities. Chest. 1994 Jan;105(1):175-82	
		06/00/1993	Miller A, Miller JA., Diffuse thickening superimposed on circumscribed pleural thickening related to asbestos exposure. Am J Ind Med. 1993 Jun;23(6):859-71	
		12/00/1975	Miller A, Teirstein AS, Selikoff IJ., Ventilatory failure due to asbestos pleurisy. Am J Med. 1983 Dec;75(6):911-9	
		04/00/1993	Miller A. Pulmonary function in asbestosis and asbestos-related pleural disease. Environ Res. 1993 Apr;61(1):1-18	
Molgaard 003		00/00/1992	Molgaard & Brodine, Epidemiologic Concepts (excerpts from Encyclopedia of Microbiology - Vol. 2)	
		06/25/2009	Molgaard Deposition Transcript	
		05/00/2008	Morokawa N, Takayanagi N, Ubukata M, Kurashima K, Yoned K, Tsuchiy N, Miyahara Y, Yamaguchi S, Tokunaga D, Saito H, Yanagisawa T, Sugita Y, Kawabata Y, Autopsy case of diffuse pleural thickening presenting respiratory impairment and benign asbestos pleurisy. Nihon Kokyuki Gakkai Zasshi. 2008 May;46(5):368-73	

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	Molgaard 016	00/00/0000	Mortality Review entitled "Mortality in Libby, Montana, 1979-1998"	ASD2000001 - ASD000034
		00/00/1991	N. Al Jarad, N. Poulakism, C. Pearson, . B. Rubens R. M. Rudd, Assessment of asbestos-induced pleural disease by computed tomography - correlation with chest radiograph and lung function, 85 Respiratory Med. 203 (1991)	
		00/00/1992	N. Al Jarad, P Wilkinson, M C Pearson, R M Rudd, A new high resolution computed tomography scoring system for pulmonary fibrosis, pleural disease, and emphysema in patients with asbestos related disease British Journal of Industrial Medicine 1992;49:73-84	
	Molgaard 001	00/00/0000	NIOSH Work-Related Lung Disease (World) Surveillance System Charts	
	Molgaard 008	11/00/2003	Peipins, et al., Radiographic Abnormalities and Exposure to Asbestos-Contaminated Vermiculite in the Community of Libby, Montana, USA	
	Peterson 002D	01/00/2009	Peterson Estimation Expert Report: Projected Liabilities for Asbestos Personal Injury Claims As of April 2001(June 2007 revised January 2009)	
	Peterson 002B	03/00/2009	Peterson Trust Expert Report: Preliminary Expert Report on W.R. Grace Trust	
	Frank 016; Whitehouse 006 (06/16/2009)	00/00/2009	PowerPoint Slides re Lincoln County, MT	
		03/28/2003	Proof of Claim re Fireman's Fund Insurance Company and attachments	

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		03/28/2003	Proof of Claim re Fresenius Medical Care Holdings, Inc. and attachments	
		04/06/2009	Rebuttal Expert Report of Dr. Howard Ory	
		04/06/2009	Rebuttal Report of B. Thomas Florence, PhD to the Expert Report of Dr. Alan Whitehouse	
		12/29/2008	Rebuttal Report of Daniel A. Henry, M.D. in Response to Expert Report of Alan C. Whitehouse, M.D.	
		04/06/2009	Rebuttal Report of David Weill	
		04/06/2009	Rebuttal Report of Dr. John E. Parker	
		04/06/2009	Rebuttal Report of Suresh H. Moolgavkar, M.D., Ph.D.	
		05/22/1996	Reimbursement Agreement re Aetna Casualty and Surety Company	
		02/09/1996	Reimbursement Agreement re Allstate Insurance Company	
		11/17/1995	Reimbursement Agreement re American Home Assurance Company and other AIG Companies	
		11/02/2000	Reimbursement Agreement re American Home Assurance Company and other AIG Companies	
		06/14/1996	Reimbursement Agreement re American Re-Insurance Insurance Company	
		05/22/1997	Reimbursement Agreement re Continental Casualty Company	
		11/17/1995	Reimbursement Agreement re Eagle Star Insurance Company and Underwriters at Lloyd's London and Certain London Market Insurance Companies	

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		11/03/1998	Reimbursement Agreement re Gerling Konzern	
		10/08/1998	Reimbursement Agreement re Hartford Accident and Indemnity Company and other Hartford Company	
		12/01/1998	Reimbursement Agreement re Highlands Insurance Company	
		08/28/1998	Reimbursement Agreement re Mutual Marine Office (EMC)	
		07/18/2000	Reimbursement Agreement re TIG Insurance Company	
		06/25/1999	Reimbursement Agreement re Zurich International (Bermuda) Ltd.	
		03/31/1998	Reorganization of WR Grace and Combination of Sealed Air Corporation and the Packaging Business of WR Grace Deal Book	
Frank 004		05/14/2009	Response of Dr. Frank and Dr. Whitehouse to Report of the ACC's Dr. L. Welch March 2009	
Frank 006		05/14/2009	Response of Dr. Frank and Dr. Whitehouse to Report of the ACC's Dr. G. Stockman, 4/6/09	
Frank 005		05/14/2009	Response of Dr. Frank and Dr. Whitehouse to the ACC's Dr. G. Friedman, 4/6/09	
		00/00/2009	Resume of Jeffrey M. Posner	
		00/00/2009	Resume of Mark A. Peterson	
		01/00/1991	Rosenstock L., Roentgenographic manifestations and pulmonary function effects of asbestos-induced pleural thickening. Toxicol Ind Health.1991 Jan-Mar;7(1-2):81-7	
		00/00/0000	Rule 1006 Summary of Data Extracted from Grace's Historical Asbestos PI Claims Database	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		00/00/1978	Sargent E, et al. Bilateral pleural thickening: a manifestation of asbestos dust exposure. Am Journal Roentgenology 1978; 131:579-585	
		00/00/1984	Sargent E, et al. Subpleural fat pads in patients exposed to asbestos: distinction from non-calcified pleural plaques. Radiology 1984; 152:273-277	
Whitehouse 013 (06/16/2009)		00/00/1990	Schwartz et al., Asbestos-Induced Pleural Fibrosis and Impaired Lung Function	
		12/31/2000	Sealed Air Annual Report for fiscal year ended 12/31/2000	
		00/00/0000	Sealed Air Corporation - Listing of Cases For Bankruptcy Proof of Claim	
Molgaard 012		00/00/1992	Selikoff & Seidman, Use of Death Certificates in Epidemiological Studies, Including Occupational Hazards: Variations in Discordance of Different Asbestos-Associated Diseases on Best Evidence Ascertainment	
		05/22/1996	Settlement Agreement between W.R. Grace & Co. and AETNA Casualty & Surety Company	
		02/09/1996	Settlement Agreement between W.R. Grace & Co. and Allstate Insurance Company	
		11/02/2000	Settlement Agreement between W.R. Grace & Co. and American Home Assurance Company	
		11/21/1995	Settlement Agreement between W.R. Grace & Co. and American Home Assurance Company	
		06/14/1996	Settlement Agreement between W.R. Grace & Co. and American Re-Insurance Company	
		05/22/1997	Settlement Agreement between W.R. Grace & Co. and Continental Casualty Company	

**EXHIBIT A****WR Grace:****Plan Proponents' Trial Exhibit List (Description Order)  
Documents Other Than Pleadings and Plan Documents**

<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		11/17/1995	Settlement Agreement between W.R. Grace & Co. and Eagle Star Insurance Company	
		11/03/1998	Settlement Agreement between W.R. Grace & Co. and Gerling-Konzern Allgemeine Versicherungs-AG	
		09/00/1998	Settlement Agreement between W.R. Grace & Co. and Hartford Accident & Indemnity Company	
		12/01/1998	Settlement Agreement between W.R. Grace & Co. and Highlands Insurance Company	
		08/28/1998	Settlement Agreement between W.R. Grace & Co. and Mutual Marine Office, Inc.	
		07/18/2000	Settlement Agreement between W.R. Grace & Co. and TIG Insurance Company	
		06/00/1999	Settlement Agreement between W.R. Grace & Co. and Zurich International (Bermuda) Ltd.	
		08/21/1995	Settlement Agreement between WR Grace and Admiral Insurance Company	
		02/20/1992	Settlement Agreement between WR Grace and Aetna Casualty and Surety Company	
		06/04/1994	Settlement Agreement between WR Grace and Allstate Insurance Company	
		05/26/1995	Settlement Agreement between WR Grace and American Centennial Insurance Company	
		11/01/1995	Settlement Agreement between WR Grace and American Re-Insurance Insurance Company	
		11/12/1999	Settlement Agreement between WR Grace and Ancon Insurance Company (UK) Limited	

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Documents Other Than Pleadings and Plan Documents**

<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		05/18/1998	Settlement Agreement between WR Grace and Bermuda Fire & Marine Insurance Company Limited	
		05/14/1993	Settlement Agreement between WR Grace and Commercial Union	
		10/07/1998	Settlement Agreement between WR Grace and Commercial Union	
		08/01/1990	Settlement Agreement between WR Grace and Continental Casualty Company	
		02/18/1997	Settlement Agreement between WR Grace and Continental Casualty Company	
		10/15/1998	Settlement Agreement between WR Grace and English & American Insurance Company Limited	
		11/17/1997	Settlement Agreement between WR Grace and Federal Insurance Company	
		12/30/1996	Settlement Agreement between WR Grace and Fireman's Fund Insurance Company	
		09/22/1995	Settlement Agreement between WR Grace and Fireman's Fund Insurance Company	
		03/03/1994	Settlement Agreement between WR Grace and General Insurance Company of America	
		11/17/2000	Settlement Agreement between WR Grace and Gerling Konzern	
		06/03/1998	Settlement Agreement between WR Grace and Guarantee Insurance Company	
		09/27/1993	Settlement Agreement between WR Grace and Home Insurance Company	

**EXHIBIT A**  
**WR Grace:**  
**Plan Proponents' Trial Exhibit List (Description Order)**  
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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		11/14/1997	Settlement Agreement between WR Grace and Home Insurance Company and Other Home Companies	
		03/03/1994	Settlement Agreement between WR Grace and Insurance Company of North America and other CIGNA Companies	
		08/19/1996	Settlement Agreement between WR Grace and KWELM Companies (CIP superceded by 8/20/04 agreement)	
		08/20/2004	Settlement Agreement between WR Grace and KWELM Companies	
		03/25/1998	Settlement Agreement between WR Grace and KWELM Management Services Ltd. as Agent of Bryanston	
		11/21/2006	Settlement Agreement between WR Grace and Lloyd's Underwriters	
		04/03/1998	Settlement Agreement between WR Grace and Ludgate Insurance Company, Ltd.	
		09/01/1991	Settlement Agreement between WR Grace and Maryland Casualty Company	
		03/18/1996	Settlement Agreement between WR Grace and Maryland Casualty Company	
		11/17/1995	Settlement Agreement between WR Grace and Minster Insurance Ltd.	
		10/08/1993	Settlement Agreement between WR Grace and Prudential Reinsurance Company and Gibraltar Casualty Company	
		01/05/1995	Settlement Agreement between WR Grace and Royal Indemnity Company	

## EXHIBIT A

## WR Grace:

**Plan Proponents' Trial Exhibit List (Description Order)**  
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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		05/11/1994	Settlement Agreement between WR Grace and Royal Indemnity Company	
		11/17/1995	Settlement Agreement between WR Grace and Swiss Union Gen. Ins. Co. Ltd.	
		01/05/2000	Settlement Agreement between WR Grace and Transit Casualty Company in Receivership	
		08/06/1992	Settlement Agreement between WR Grace and Unigard Security Insurance Company	
		05/15/1995	Settlement Agreement between WR Grace and Unigard Security Insurance Company	
		09/11/1995	Settlement Agreement between WR Grace and United States Fire Insurance Company	
Frank 014		04/00/2007	Sullivan, Vermiculite, Respiratory Disease, and Asbestos Exposure in Libby, Montana: Update of a Cohort Mortality Study	
Molgaard 015		01/06/2005	Summons in Pederson v. Saberhagen Holdings, Inc. et al. (05-2-02651-5 SEA)	
		07/05/2000	Supersedeas Bond, Edwards, et al., v. Pittsburgh Corning Corp., et al., Case No. B-150,896-J, (Dist. Ct Jefferson Cty, Tex.)	
		03/30/1998	Supplemental Agreement dated as of March 30, 1998, among W.R. Grace & Co., Cryovac, Inc., W.R. Grace & Co.-Conn., and Grace Specialty Chemicals, Inc.	
Frank 002		03/12/2009	Supplemental Expert Report of Dr. Arthur Frank	
		12/21/1992	Support Terminal Services, Inc. Insurance Procedures Agreement Between WR Grace & Co., WR Grace & Co.-Conn., Grace Energy Corp., Kaneb Pipe Line Operating partnership, L.P., NSTS, Inc., and NSTI, Inc.	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
	Frank 007	05/14/2009	Sur-Rebuttal and Supplemental Expert Report by Dr. Alan C. Whitehouse	
	Molgaard 005	05/16/2009	Sur-Rebuttal and Supplemental Expert Report by Dr. Alan C. Whitehouse	
	Frank 003	05/14/2009	Sur-Rebuttal and Supplemental Expert Report of Dr. Arthur L. Frank	
	Molgaard 002	05/18/2009	Sur-Rebuttal Report of Craig Molgaard (Epidemiology)	
		04/00/2008	Term Sheet For Resolution Of Asbestos Personal Injury Claims	
		00/00/2009	Todd Maynes Declaration	
		03/00/2009	U.S. v. Grace, et al., Criminal Trial Transcript (evening session)	
		03/00/2009	U.S. v. Grace, et al., Criminal Trial Transcript (morning session)	
	Sigel 12	00/00/0000	Various Confidential MALS Settlement Agreements	
		00/00/0000	Various Proofs Of Claims of Non-Libby Claimants Filed in Chapter 11 Case with Respect to Non-Products/Premises Claims	
		00/00/0000	W.R. Grace Historical Case Management System Database	
	Frank 013	00/00/2007	Welch, Asbestos Exposure Causes Mesothelioma, But Not This Asbestos Exposure: An Amicus Brief to the Michigan Supreme Court	
		03/19/2009	Whitehouse Deposition Transcript (from Confirmation case)	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		06/16/2009	Whitehouse Deposition Transcript (from Confirmation case)	
		10/18/2007	Whitehouse Deposition Transcript (from Estimation case)	
		11/15/2007	Whitehouse Deposition Transcript (from Estimation case)	
Molgaard 006		00/00/2008	Whitehouse et al., Environmental Exposure to Libby Asbestos and Mesotheliomas	
Molgaard 004		12/29/2008	Whitehouse Expert Report	
Whitehouse 001(06/16/2009)		05/14/2009	Whitehouse Expert Report: Sur-Rebuttal and Supplemental Expert Report	
Molgaard 007		00/00/2004	Whitehouse, Asbestos-Related Pleural Disease Due to Tremolite Associated With Progressive Loss of Lung Function: Serial Observations in 123 Miners, Family Members, and Residents of Libby, Montana	

## EXHIBIT A

WR Grace:

Plan Proponents' Trial Exhibit List (Description Order)  
Pleadings and Plan Documents

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
	Welch 004; Inselbuch 004; Whitehouse 002 (06/16/2009); Frank 011	00/00/2009	2009 Grace TDP	
		05/30/2001	Affidavit of H. Katherine White In Support Of Debtors' Motion For Preliminary Injunction (Dkt. 36; Adv. 01-771)	
		11/26/2007	Agreed Order Granting Libby Claimants' Motion in Limine Concerning Estimation Proceeding Evidence (Dkt. No. 17431)	
		05/08/2009	Debtors' Plan Supplement to The First Amended Joint Plan of Reorganization Under Chapter 11 of The Bankruptcy Code of W.R. Grace & Co., et al., The Official Committee of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, and The Official Committee of Equity Security Holders Dated as of February 27, 2009 (Dkt. No. 21594)	
		02/27/2009	Debtors' Disclosure Statement For The First Amended Joint Plan of Reorganization Under Chapter 11 of The Bankruptcy Code of W.R. Grace & Co., et al., The Official Committee of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, and The Official Committee of Equity Security	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
			Holders Dated as of February 27, 2009 (Dkt. No. 20873)	
		07/16/2007	Debtors' Limited Reply To Objections to Tenth Motion For An Order Extending Debtors' Exclusive Periods (Dkt. 16297)	
		06/13/2008	Debtors' Objection to the Unsecured Claims Asserted Under the Debtors' Credit Agreements dated as of May 14, 1998 and May 5, 1999 including exhibits A) Proof Of Claim With Respect to the 1998 Credit Agreement; B) Proof Of Claim With Respect to the 1999 Credit Agreement; C) Proposed Asbestos Settlement; D) Bench Ruling by Judge Gerber from In re Adelphia Communications; E) Bench Ruling by Judge Drain from In re Loral Space & Communications Ltd (Dkt. 18922)	
		04/21/2005	Debtors' Response To Renewed Motion For An Order Approving, Authorizing And Implementing Settlement Agreement with Sealed Air (Dkt. No. 738; Adv. 02-2210)	
		06/18/2007	Debtors' Tenth Motion for an Order Pursuant to 11 U.S.C § 1121(d) Extending Debtors' Exclusive Periods in Which to File a Chapter 11 Plan and to Solicit Votes Thereon (Dkt. 16083)	
		06/08/2009	Declaration of Kevin A. Martin (BMC) Certifying Tabulation Of Ballots Regarding Vote On First Amended Joint Plan Of Reorganization (Dkt. 22020)	

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<b><u>Trial Ex.</u></b>	<b><u>Dep. Ex.</u></b>	<b><u>Doc Date</u></b>	<b><u>Doc Description</u></b>	<b><u>Bates Range</u></b>
		07/10/2008	Declaration of Lewis Kruger in Support of the Official Committee of Unsecured Creditors' Response to Debtors' Objection to the Unsecured Claims Asserted Under the Debtors' Credit Agreements dated May 14, 1998 and May 5, 1999 (Dkt. 19072)	
		06/26/2009	Declaration of Mark A. Shelnitz (Dkt. 22279)	
		08/14/2008	Declaration of Robert M. Tarola in Support of Debtors' Objection to the Unsecured claims Asserted Under the Debtors' Credit Agreements dated May 14, 1998 and May 5, 1999 (Dkt. 19323)	
		02/27/2009	Exhibit Book to The First Amended Joint Plan of Reorganization and Disclosure Statement as of February 27, 2009 (Dkt. No. 20874)	
		12/08/2007	FILED UNDER SEAL - The Official Committee of Asbestos Personal Injury Claimants' Omnibus Motion to Exclude or Limit Testimony Pursuant to Daubert and Rules 702 and 703 of the Federal Rules of Evidence (Dkt. 17584)	
		02/27/2009	First Amended Joint Plan of Reorganization Under Chapter 11 of The Bankruptcy Code of W.R. Grace & Co., et al., The Official Committee of Asbestos Personal Injury Claimants, The Asbestos PI Future Claimants' Representative, and The Official Committee of Equity Security Holders Dated as of February	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
			27, 2009 (Dkt. No. 20872)	
		12/21/2007	Future Claimants' Representative's Opposition to Motions of W.R. Grace and Official Committee of Equity Security Holders to Exclude Expert Opinions in Connection with the Estimation of Grace's Current and Future Asbestos Personal Injury Liability (Dkt. 17697)	
		12/21/2007	Grace's Memorandum in Opposition to Claimants' Motion to Exclude Expert Testimony and Exhibits to Memorandum (Dkt. No. 17695)	
		12/08/2007	Grace's Memorandum in Support of its Motion to Exclude Expert Opinions in Connection with the Estimation of its Current and Future Asbestos Personal Injury Liability (Dkt. 17586)	
		12/08/2007	Grace's Motion to Exclude Expert Opinions in Connection with the Estimation of its Current and Future Asbestos Personal-Injury Liability (Dkt. 17585)	
		09/19/2008	Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code of W.R. Grace & Co., et al., the Official Committee of Asbestos Personal Injury Claimants, the Asbestos PI Future Claimants' Representative, and the Official Committee of Equity Security Holders dated as of September 19, 2008 (Dkt. 19579)	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		05/20/2009	Libby Claimants' Objection to First Amended Joint Plan of Reorganization (Dkt. No. 21811)	
		04/15/2003	Motion For An Order Approving, Authorizing And Implementing Settlement By And Among Plaintiffs, The Official Committee Of Asbestos Property Damage Claimants, Debtors, And The Official Committee Of Asbestos Personal Injury Claimants, And Defendants, Fresenius Medical Care Holdings, Inc. and National Medical Care, Inc. (Dkt. No. 16; Adv. 02-2211)	
		11/26/2003	Motion For An Order Approving, Authorizing, And Implementing Settlement Agreement with Sealed Air (Dk. 597; Adv. 02-2210)	
		12/07/2007	Official Committee of Equity Security Holders' Memorandum in Support of Debtors' Motion to Exclude Certain Expert Opinions Relating to Current and Future Asbestos Personal Injury Liability (Dkt. 17577)	
		06/27/2005	Order Approving, Authorizing, and Implementing Settlement Agreement By and Among The Plaintiffs, Sealed Air Corporation and Cryovac, Inc. (Dkt. 751; Adv. 02-2210)	
		06/25/2003	Order Authorizing, Approving and Implementing Settlement Agreement By and Among Plaintiffs The Official Committee of Asbestos Property Damage Claimants and The Official Committee of Asbestos Personal Injury Claimants, The Debtors, and Defendants	

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WR Grace:

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
			Fresenius Medical Care Holdings, Inc. and National Medical Care, Inc. (Dkt. No. 19; Adv. 02-2211)	
		03/19/2007	Order Disallowing And Expunging Certain of The Claims of Sealed Air Corporation and Its Affiliates (Dkt. No. 14891) and Sealed Air Filed Proof of Claims Nos. 14330 - 14363	
		01/22/2002	Order Granting Modified Preliminary Injunction (Dkt. 87; Adv. 01-771)	
		03/18/2002	Original (Fresenius) Complaint (Dkt. No. 1; Adv. 02-2211)	
		03/18/2002	Original (Sealed Air) Complaint (Dkt. 1; Adv. 02-2210)	
		04/01/2005	Renewed Motion For An Order Approving, Authorizing, And Implementing Settlement Agreement with Sealed Air (Dkt. 729; Adv. 02-2210)	
		01/07/2008	Reply Memorandum in Support of Grace's Motion to Exclude Expert Opinions in Connection with the Estimation of its Current and Future Asbestos Personal Injury Liability (Dkt. 17779)	
		12/05/2007	Revised and Amended Case Management Order for the Estimation of Asbestos Personal Injury Liabilities (Dkt. 17550)	

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<u>Trial Ex.</u>	<u>Dep. Ex.</u>	<u>Doc Date</u>	<u>Doc Description</u>	<u>Bates Range</u>
		11/26/2003	Settlement Agreement and Release re Sealed Air (Dkt. No. 597; Adv. 02-2210)	
		04/21/2003	Status Report Pursuant to This Court's Order Dated March 31, 2003 (Dkt. No. 3688)	
		12/21/2007	The Official Committee of Asbestos Personal Injury Claimants' Response to Grace and the Equity Committee's Motions to Exclude or Limit Expert Testimony (Dkt. 17694)	
		04/02/2001	Verified Complaint for Declaratory and Injunctive Relief (Dkt. No. 1; Adv. 01-771)	
		06/21/2004	W.R. Grace's Status Report (Dkt. No. 5858)	